

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

15-CR-149-A

-v-

FRANK R. PARLATO, Jr., et. al.,

Defendants

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**APPLICATION FOR EXTENSION**  
**OF NOTICE OF LIS PENDENS**

The United States of America, by its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Kevin D. Robinson, Assistant United States Attorney, of counsel, respectfully requests that this Court issue an order directing that the duration of the Lis Penden filed against the real property named in the Indictment located at 29009 Geranium Drive, Big Pine Key, Florida on November 30, 2015 in the office of the Clerk of Court, Monroe County, Florida, be extended until November 30, 2022. In support thereof, the plaintiff offers the attached affidavit of Kevin D. Robinson, Assistant United States Attorney and Exhibit, as well as all prior pleadings and proceedings had in this matter.

DATED: Buffalo, New York, July 21, 2022.

TRINI E. ROSS  
United States Attorney  
Western District of New York

By: s/KEVIN D. ROBINSON  
Assistant United States Attorney  
138 Delaware Avenue  
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**AFFIDAVIT IN SUPPORT OF REQUEST  
FOR EXTENSION OF NOTICE OF LIS PENDENS**

State of New York     )  
County of Erie         ) SS:  
City of Buffalo        )

Kevin D. Robinson, hereby states under penalty of perjury:

1. I am an Assistant United States Attorney for the Western District of New York, and I am the forfeiture attorney assigned to my office's file concerning this prosecution. This affidavit is submitted in support of the government's request that the Notice of Lis Pendens filed in the office of the Clerk of Court, Monroe County, Florida, be extended until November 30, 2021.

2. On November 20, 2015, an Indictment was filed against defendants, Frank Parlato, Jr. and Chitra Selvaraj, seeking the forfeiture of the defendant Parlato's interest, inter alia, in the premises and real property commonly known as: 29009 Geranium Drive, Big Pine Key, Florida, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1).

3. On November 30, 2015, a Notice of Lis Pendens was filed in the office of the Clerk of the Clerk of Court, Monroe County, Florida, against the premises and real property known as 29009 Geranium Drive, Big Pine Key, Florida, under Document No. 2054908 and recorded in Book 2771 at Page 1423, a copy of which is annexed hereto as Exhibit "A".

4. The duration of this Notice of Lis Pendens must be extended and remain in effect because the criminal prosecution against the defendants remains pending before this Court.

WHEREFORE, it is respectfully requested that the Court enter an order extending the Notice of Lis Pendens filed in this action against 29009 Geranium Drive, Big Pine Key, Florida, until November 30, 2022.

A proposed Order is submitted contemporaneously with this application for the Court's consideration and convenience.

s/KEVIN D. ROBINSON  
Assistant United States Attorney

Subscribed and sworn to before  
me this 21st day of July, 2022.

s/Cheryl LoTempio  
Notary Public, State of New York  
Qualified in Erie County  
Commission Expires 6/30/2026